

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

SARRI ANNE SINGER, et al.,

Plaintiffs,

-against-

BANK OF PALESTINE,

Defendant.

19-cv-006 (ENV) (RML)

**DECLARATION OF GASSAN A. BALOUL**

I, Gassan A. Baloul, submit this declaration pursuant to 28 U.S.C. § 1746 and declare as follows:

1. I am a partner with the law firm Squire Patton Boggs (US) LLP, counsel for Defendant, Bank of Palestine (“BOP”), in the above-captioned matter. I am familiar with the matters set forth in this Declaration, which I respectfully submit in support of BOP’s Motion for a Protective Order (Dkt. No. 67).

2. In communications on April 13, 2022, Kristen A. Fiore, Assistant General Counsel, Citibank, confirmed to Squire Patton Boggs that Citibank does not possess records responsive to Plaintiffs’ third-party subpoena served on Citibank (*see* BOP’s Mot. for Protective Order (hereinafter “MPO”), Exhibit A (Dkt. No. 67-2)).

3. In communications on or about March 28, 2022, Gabriel Torres, Assistant General Counsel, J.P. Morgan Chase Bank (“J.P. Morgan”), confirmed to Squire Patton Boggs that J.P. Morgan does not possess records responsive to Plaintiffs’ third-party subpoena served on J.P. Morgan (*see* MPO, Exhibit B (Dkt. No. 67-3)).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed in Beirut, Lebanon, on the 25th day of April, 2022.



Gassan A. Baloul